

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

TENNESSEE STATE CONFERENCE OF
THE N.A.A.C.P., *et al.*,

Plaintiffs,

v.

TRE HARGETT, in his official capacity as
Secretary of State of the State of Tennessee, *et al.*,

Defendants.

Civil Nos. 3:19-cv-365; 3:19-cv-385
Judge Aleta A. Trauger

LEAGUE OF WOMEN VOTERS OF
TENNESSEE, *et al.*,

Plaintiffs,

v.

TRE HARGETT, *et al.*,

Defendants.

**LEAGUE OF WOMEN VOTERS OF TENNESSEE–PLAINTIFFS’ MOTION FOR
ATTORNEYS’ FEES, COSTS, AND EXPENSES**

Plaintiffs League of Women Voters, League of Women Voters Tennessee Education Fund (collectively, “the League”), American Muslim Advisory Council (“AMAC”), Mid-South Peace & Justice Center (“MSPJC”), Rock the Vote, Memphis Central Labor Council (“MCLC”), and HeadCount respectfully move this Court under 42 U.S.C. § 1988 and other authority for an award of attorneys’ fees, costs, and expenses. The attorneys’ fees requested are \$479,102.85. Plaintiffs do not seek any fee enhancement from the lodestar amount. Finally, the amount of expenses to be reimbursed is \$3,928.49. As demonstrated in the supporting memorandum, which is incorporated

by reference, the amounts requested are reasonable and justified by established law and indeed substantially understate the fees and expenses actually incurred.

Plaintiffs reserve the right to seek additional fees and expenses and/or to forego the voluntary reductions already applied in their fee petition in the event a reply brief, preparation for a hearing, or other compensable work becomes necessary in order to obtain a reasonable fee award for the work performed in this matter.

Dated: December 21, 2020

/s/ Theresa J. Lee

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on December 21, 2020 by operation of the Court's electronic filing system on the following:

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